

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EMMA KONSTANTINOVNA P'YANINA,
individually and as personal :
representative of the estate of :
GENNADY VIKTOVOVICH P'YANIN, :
deceased; DMITRY GENNADIEVICH :
P'YANIN, a minor, by his mother, :
guardian and next friend, :
EMMA KONSTANTINOVNA P'YANINA; :
YURY GENNADIEVICH P'YANIN, a :
minor, by his mother, guardian and :
next friend, EMMA KONSTANTINOVNA :
P'YANINA; :

Case No. 07-cv-10403-PAC

IRINA YURIEVNA GUN'KINA, :
individually and as personal :
representative of the estate of :
OLEG BORISOVICH GUN'KIN, deceased; :
OLEGOVNA ANZHELIKA GUN'KINA, a :
minor, by her mother, guardian and :
next friend, IRINA YURIEVNA :
GUN'KINA; :

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

Plaintiffs, :

-vs-

CESSNA AIRCRAFT COMPANY, and :
GOODRICH CORPORATION, :

Defendants. :

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PURSUANT TO RULE 1.3(c) of the Local Rules of the United
States District Courts for the Southern and Eastern Districts of
New York, I, Eugene O'Neill, a member in good standing of the
bar of this Court, hereby move for an Order allowing the
admission pro hac vice of:

Michael P. Verna
BOWLES & VERNA, LLP
2121 N. California Blvd., Suite 875
Walnut Creek, CA 94596
Telephone: 925-935-3300
Facsimile: 925-935-0371

Michael P. Verna is a member in good standing of the Bar of State of California. There are no pending disciplinary proceedings against Michael P. Verna in any State or Federal court.

April 7, 2008
Dated: November, 2007.

ATTORNEYS FOR PLAINTIFFS

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Eugene O'Neill, Jr. Esq.
Goldfinger & Lassar LLP
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MICHAEL P. VERNA
BRADLEY R. BOWLES
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Of Counsel:

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UNITED STATES DISTRICT COURT
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representative of the estate of :
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P'YANIN, a minor, by his mother, :
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EMMA KONSTANTINOVNA P'YANINA; :
YURY GENNADIEVICH P'YANIN, a :
minor, by his mother, guardian and :
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P'YANINA; :
:

IRINA YURIEVNA GUN'KINA, :
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GUN'KINA; :
:

Plaintiffs, :
:

-vs- :
:

CESSNA AIRCRAFT COMPANY, and :
GOODRICH CORPORATION, :
:

Defendants. :
:

----- x
State of New York)

) ss:

County of New York)

Eugene O'Neill, being duly sworn, hereby deposes and says
as follows:

1. I am an attorney at Goldfinger & Lassar, LLP, counsel
for Plaintiffs in the above captioned action. I am familiar
with the proceedings in this case. I make this statement based

on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Michael P. Verna as counsel pro hac vice to represent Plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1981. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Michael P. Verna since 9/07.

4. Mr. Verna is a partner at the law firm of Bowles & Verna, LLP, 2121 N. California Blvd., Suite 875, Walnut Creek, CA, 94596.

5. I have found Mr. Verna to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Michael P. Verna pro hac vice.

7. I respectfully submit a proposed order granting admission of Michael P. Verna, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Michael P. Verna, pro hac vice, to represent Plaintiffs in the above-captioned matter, be granted.

Dated: April 4, 2008

New York, New York

ATTORNEYS FOR PLAINTIFFS

Eugene O'Neill 1752
Eugene O'Neill, Jr. Esq. NY BAR

CODE

Goldfinger & Lassar LLP
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Tarrytown, New York 10591
Tel. 914-347-7333
Email: gvila@kuczinskilaw.com

*Sure to and subscribed
before me this 9th day
of April 2008*

Dara Norman
DARA L. NORMAN
Notary Public, State of New York
No. 02N05067675
Qualified in New York County
Commission Expires Oct. 21, 2010



**THE STATE BAR
OF CALIFORNIA**

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

April 7, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MICHAEL PATRICK VERRA, #84070 was admitted to the practice of law in this state by the Supreme Court of California on November 29, 1978; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; that the public record states that information has been provided pursuant to Business and Professions Code section 6086.1(c); and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert
Kath Lambert
Custodian of Membership Records

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
: ss.:
COUNTY OF NEW YORK)

William Wallace

being duly sworn, deposes and says:

That on the 10 day of April 2008, s/he mailed the within Motion to Admit Counsel Pro Hac Vice of Bradley R. Bowles and Michael P. Verna of Bowles & Verna, LLP to the Parties hereinbelow named by depositing a true copy of the same securely enclosed in postpaid properly addressed wrappers in a mail box maintained and exclusively controlled by the United States Postal Service, in the State of New York, directed to said persons at the post office addresses hereinbelow their names, being their addresses of record.

NAME AND ADDRESS:

Cessna Aircraft Company
c/o Karen Nestleroad, Legal Dept. Administrator
5800 East Pawnee Road
Wichita KS 67218

Goodrich Corporation
C/O Corporation Service Company
80 State Street
Albany NY 12207

William Wallace

Sworn to and subscribed before me
this 10 day of April, 2008

Eugene O'Neill
Notary Public

Eugene O'Neill, Jr.
Notary Public, State of New York
No. 020N461114
Qualified in Nassau County
Certificate filed in Nassau County
Commission Expires March 30, 20